

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION OPIOID LITIGATION)	MDL NO. 2804 Case No: 1:17-MDL-2804
THIS DOCUMENT RELATES TO:)	
Rockingham County vs. Purdue Pharma, L.P., et al.)	
N.H. Case No: 218-2018-CV-0110)	
Belknap County v. Purdue Pharma, L.P., et al.)	
N.H. Case No: 211-2018-CV-00240)	
Cheshire County vs. Purdue Pharma, L.P., et al.)	
N.H. Case No: 213-2018-CV-00168)	
City of Belmont v. Purdue Pharma, L.P., et al.)	
N.H. Case No. 211-2018-CV-00241)	
City of Claremont v. Purdue Pharma, L.P., et al.)	
N.H. Case No. 220-2018-CV-00127)	
Grafton County v. Purdue Pharma Inc., et al.)	
N.H. Case No. 215-2018-CV-00323)	
Strafford County v. Purdue Pharma, L.P., et al.)	
N.H. Case No. 219-2018-CV-00364)	
Sullivan County v. Purdue Pharma, L.P., et al.)	
N.H. Case No: 220-2018-CV-00128)	

MOTION TO EXTEND TIME TO FILE RESPONSIVE PLEADING

Defendants, Dr. Michael Dipre and Dr. Mark Weinreb (“Defendants”), by and through their attorneys, Morrison Mahoney LLP, file this Motion to Extend Time to File Responsive Pleading, stating as follows:

1. Plaintiffs filed their Complaints on or about September 18, 2018 in the respective New Hampshire state courts.

2. This matter was removed to the United States District Court for the State of New Hampshire, then transferred to the instant MDL docket, in the United States District Court, Northern District of Ohio, Eastern Division .
3. An answer or other responsive pleading is currently due September 1, 2019.
4. Counsel for Defendants Dr. Dipre and Dr. Weinreb has just been retained (their prior counsel is filing a withdrawal and newly retained counsel are filing appearances).
5. Counsel for Defendants requests an additional 60 days, until November 1, 2019, to respond to the Plaintiff's Complaint.
6. Counsel for Defendants emailed and telephoned Plaintiff's counsel requesting his assent to this motion. To date, counsel for Defendants have not received a response.

WHEREFORE, Defendants, Dr. Michael Dipre and Dr. Mark Weinreb, respectfully request this Honorable Court:

- A. Grant this Motion to Extend Time; and
- B. Grant such other and further relief as is reasonable and just

DATED: this 23rd Day of August, 2019.

/s/ Lori K. Vaulding

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and Mark Weinreb, M.D.*

CERTIFICATE OF SERVICE

I hereby certify that on the below stated date, I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system.

Signed at Boston, Massachusetts this 23rd day of August, 2019.

/s/ Lori K. Vaulding

Lori K. Vaulding